

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

**November 2021 GRAND JURY
(Impaneled November 5, 2021)**

THE UNITED STATES OF AMERICA

21-CR-15-JLS

SUPERSEDING INDICTMENT

-VS-

NICHOLAS TURNQUIST

Violations:

Title 18, United States Code,
Section 2423(a)
(5 Counts)

COUNT 1

(Transportation of a Minor)

The Grand Jury Charges That:

On or about April 26, 2014, in the Western District of New York, and elsewhere, the defendant, NICHOLAS TURNQUIST, did knowingly transport, and attempt to transport, Victim 1, an individual known to the Grand Jury, who had not attained the age of 18 years, in interstate commerce, that is, from the state of New York to the state of Maryland, with the intent that such individual engage in sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2423(a) and 2423(e).

COUNT 2

(Transportation of a Minor)

The Grand Jury Charges That:

On or about September 5, 2014, in the Western District of New York, and elsewhere, the defendant, NICHOLAS TURNQUIST, did knowingly transport, and attempt to transport, Victim 1, an individual known to the Grand Jury, who had not attained the age of 18 years, in foreign commerce, that is, from the state of New York to Niagara Falls, Canada, with the intent that such individual engage in sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2423(a) and 2423(e).

COUNT 3

(Transportation of a Minor)

The Grand Jury Charges That:

On or about December 23, 2014, in the Western District of New York, and elsewhere, the defendant, NICHOLAS TURNQUIST, did knowingly transport, and attempt to transport, Victim 1, an individual known to the Grand Jury, who had not attained the age of 18 years, in interstate commerce, that is, from the state of New York to the state of Pennsylvania, with the intent that such individual engage in sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2423(a) and 2423(e).

COUNT 4

(Transportation of a Minor)

The Grand Jury Charges That:

On or about July 16, 2015, in the Western District of New York, and elsewhere, the defendant, NICHOLAS TURNQUIST, did knowingly transport, and attempt to transport, Victim 1, an individual known to the Grand Jury, who had not attained the age of 18 years, in interstate commerce, that is, from the state of New York to the state of Pennsylvania, with the intent that such individual engage in sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2423(a) and 2423(e).

COUNT 5

(Transportation of a Minor)

The Grand Jury Charges That:

On or about September 19, 2015, in the Western District of New York, and elsewhere, the defendant, NICHOLAS TURNQUIST, did knowingly transport, and attempt to transport, Victim 1, an individual known to the Grand Jury, who had not attained the age of 18 years, in interstate commerce, that is, from the state of New York to the state of Florida, with the intent that such individual engage in sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2423(a) and 2423(e).

DATED: Buffalo, New York, March 8, 2022.

TRINI E. ROSS
United States Attorney

BY: /S/PAUL E. BONANNO
PAUL E. BONANNO
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
716/843-5795
paul.bonanno@usdoj.gov

A TRUE BILL:

/S/FOREPERSON
FOREPERSON